

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: DAVID DILLON THOMPSON,	:	Chapter 13
Debtor(s),	:	Case No. 5:22-bk-02421-MJC
DAVID DILLON THOMPSON,	:	
Objector(s),	:	Objection to
v.	:	Proof of Claim
QL TITLING TRUST LTD.,	:	
Claimant.	:	

LIMITED MOTION TO EXTEND TIME TO FILE BILL OF FEES AND COSTS

AND COMES NOW Debtor(s) **DAVID DILLON THOMPSON**, by and through their attorneys, LAW OFFICES OF JOHN FISHER, ESQUIRE, with Limited Motion to Extend Time to File Bill of Fees and Costs and in support thereof aver(s) as follows:

1. On May 8, 2023, the Honorable Court Sustained Debtor's Objection to Proof of Claim No. 1 of **QL TITLING TRUST LTD.** ("Claimant") and provided until May 22, 2023, to file a bill of fees and costs.
2. Based on the representations of Counsel for Debtor at the hearing on the Objection, Counsel for Debtors only anticipate filing a bill of fees and costs if Claimant seeks to Reconsider or Appeal the May 8, 2023, Order or file and Amended Proof of Claim.
3. As Counsel for Debtor will not be aware until at least May 8, 2023, if any of those events (Claimant seeks to Reconsider or Appeal the May 8, 2023, Order or file and Amended Proof of Claim) will occur.
4. For these reasons, Debtor seeks an extension of time to file a bill of fees and costs until fourteen (14) days after any filing by Claimant of a Motion to Reconsider, Appeal or Amended Proof of Claim, but that provides that absent any such occurrence, the filing of bill of fees and costs would be waived.

WHEREFORE, Debtor **DAVID DILLON THOMPSON** prays this Honorable Court for an Order that Extends the time to file a bill of fees and costs pursuant to the May 8, 2023, Order until fourteen (14) days after Claimant **QL TITLING TRUST, LTD.**, files a Motion to Reconsider or an Appeal with regard to the May 8, 2023, Order, or an Amended Proof of Claim, that absent such event, the opportunity to file a bill of fees and costs pursuant to the May 8, 2023, Order would be waived, and for such other and further relief as the Honorable Court deems just and appropriate.

/s/ John Fisher

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